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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

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JUSTIN OLSON

Arizona Corporation Commission

DOCKETED

MAR 25 2019

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IN THE MATTER OF POSSIBLE
MODIFICATIONS TO THE
COMMISSION'S ENERGY RULES.

DOCKET NO. RU-00000A-18-0284

CALPINE ENERGY SOLUTIONS,
LLC'S COMMENTS IN SUPPORT
OF CERTAIN OF AECC'S
COMMENTS ON POSSIBLE
MODIFICATIONS TO THE
COMMISSION'S ENERGY
RULES

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Calpine Energy Solutions, LLC ("Calpine Solutions") hereby submits these Comments in support of that portion of AECC's March 22, 2019 Comments On Possible Modifications To The Commission's Energy Rules ("AECC Comments") which pertain to the subject of retail electric competition. As noted in Footnote 1 of the AECC Comments, Calpine Solutions and AECC have filed a December 7, 2018 Joint Motion with the Commission in this docket in which they urged the Commission to establish a separate rulemaking track and process for addressing the possible resumption of retail electric competition in Arizona. In that regard, as noted in Footnote 2 of the AECC Comments, on December 19, 2018 the Commission opened Docket No. RE-00000A-18-0405 to deal specifically with retail electric competition.

In its March 22, 2019 Comments, AECC expresses its belief that the Commission should use Docket No. RE-00000A-18-0405 as the procedural means by which "to evaluate retail electric competition on a separate track from its broader consideration of

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1 possible modifications to the Commission's Energy Rules." Calpine Solutions shares that
2 belief and urges the Community to adopt it as the Commission's preferred course of action
3 on this subject.

4 In the alternative, AECC believes that, at a minimum, the Commission should
5 contemporaneously evaluate the adoption of rules designed to allow for the resumption of
6 retail electric competition "in parallel with the Renewable Energy Standard and Tariff
7 ('REST') rules and Integrated Resource Planning ('IRP') rules so that a full market can be
8 structured and developed inclusive of those concepts." Calpine Solutions shares that
9 alternative viewpoint as well, and assumes that the procedural means for doing so would be
10 contemporaneous and complimentary rulemaking activities in Docket Nos. RU-00000A-
11 18-0284 and RE-00000A-18-0405.

12 Finally, Calpine Solutions has no position at this time on that portion of the AECC
13 Comments relating to the subject of electric vehicles.

14 Respectfully submitted this 25th day of March, 2019.

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1 ORIGINAL and 13 copies of the foregoing
2 will be filed this 25th day of March, 2019, with:

3 Docket Control
4 Arizona Corporation commission
5 1200 W. Washington Street
6 Phoenix, Arizona 85007

7 COPY of the foregoing hand-delivered/mailed/emailed
8 this 25th day of March, 2019 to:

9 Sarah N Harpring
10 Assistant Chief Administrative Law Judge
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